

EPA Comments for Proposed Title V Permit Renewal Evaluation for Occidental of Elk Hills, Facility ID S-1216, Project # S-1075158

Comment 1:

On page 72 of the Districts evaluation, under Section 19, several emission units are evaluated for CAM (Part 64 applicability). EPA notes that in numerous cases where the equipment includes vapor recovery, the evaluation states that the VOC control system is not a control device as defined in CAM and is therefore not subject to CAM. This is an insufficient analysis. The evaluation must include an explanation as to why a “control system” is not a “control device.” EPA has recently noted in other proposed Title V permit actions that the District has determined that some vapor recovery systems are “inherent process equipment” and are therefore not subject to CAM requirements. EPA has disagreed with those determinations and provided comments to the District on how to reevaluate for CAM applicability.

This proposed permit has numerous tanks equipped with vapor recovery systems that EPA believes may be subject to CAM and for which a more detailed CAM applicability determination is required. In general, for tanks connected to a vapor recovery system, there are three parts to the system. First there is the storage tank which is the emitting source. The control device then consists of two parts, the capture and collection system, and finally the device that condenses or destroys the captured emissions. It is not clear from the current CAM evaluation whether any of the permitted vapor recovery systems are vented to control devices, but it is reasonable to expect that most systems are vented to some type of control device. The vapor recovery systems are not inherent process equipment because they are required to control emissions and do not affect the ability to operate a storage tank. Thus to properly evaluate CAM applicability the District must determine the uncontrolled emission rates from the emission units to determine if the emissions are over the major source thresholds. Any fugitive emissions from the capture and control system must be included in the emission rates.

Please review all permits for all tanks connected to a vapor recovery system for CAM applicability using the methodology EPA has outlined above and revise the CAM evaluation section as necessary.

Comment 2:

On page 76 of the Districts evaluation, under Section 19.t., the District determines that permit unit S-1216-71-1 is subject to CAM, and states that the facility will monitor and record the catalyst inlet and outlet temperatures daily. Recent studies have shown that monitoring the temperature change across the catalyst is not a adequate indicator of compliance. EPA suggests setting a minimum inlet temperature to ensure the catalyst is at the proper operating temperature (determined by source testing) and periodic monitoring of the NO_x emissions with a portable monitor. EPA notes that permit condition numbers 19-22 require periodic monitoring with a portable monitor and include conditions to ensure proper operation of the monitor. However the current frequency of this monitoring is only quarterly unless two consecutive violations are found, then monitoring would be required monthly for 12 months. EPA believes that since this emission unit is large enough to trigger CAM (i.e., the emission unit is an uncontrolled major source), that the periodic monitoring should be at least monthly.

Please revise condition 19 as needed to require monthly monitoring and the evaluation to indicate the type of monitoring required to comply with Part 64 CAM requirements.